

MEMORANDUM

TO: Data Governance Council

FROM: Preferred Name Project Core Team (Mary Bergstrom; Deanna Caveny-Noecker, Project Lead; Lynne Ford; Mary Person; Eileen Raney)

DATE: July 24, 2018

RE: Final documentation re name definitions and data integrity guidelines

Data Governance Council colleagues, this memorandum is a final version of the proposal that you endorsed in November 2017 and, in modified form, in February 2018. With this final version, the only change is to introduce a fourth name usage category, namely Professional Last Name for employees who are not also students, in addition to the three previously approved by the DGC, namely Employment Eligibility Name, Student Legal Name, and Preferred First Name.

**Employment Eligibility Name**

As specified in College of Charleston Policy 9.1.12, *Employment Eligibility Verification Form I-9 and E-Verify Policy*, the College must comply with the Immigration Reform and Control Act (hereafter, “IRCA”), which requires all newly hired employees to complete an Employment Eligibility Verification Form I-9 (hereafter “I-9 Form” or “I-9”) and requires the College to verify each new hire’s identity and employment eligibility to work in the United States. The College is also an E-Verify employer. E-Verify confirms whether the information provided on the I-9 Form matches government records for purposes of determining employment eligibility in the United States.

The **Employment Eligibility Name** field will be populated for all employees and only with e-verified names. It will be maintained by Human Resources for all regular employees and by Career Services for all student employees, including graduate student employees. The recorded employment eligibility name should not be changed without documentation consistent with that required upon submission of an I-9 form and should not be changed by offices other than Human Resources for all employees, or Career Services for student employees.

**Student Legal Name**

The College of Charleston requires a student’s full legal name to be used for federal financial aid consideration, awards, disbursements, and reporting; for bill collection and for Internal Revenue Services forms generated for students and their families by our Treasurer’s Office; and for the processing and tracking of student visas through the Department of Homeland Security’s Student

and Exchange Visitor Program's information system, SEVIS, administered by U.S. Immigration and Customs Enforcement. This student legal name is also used for regulatory reporting by the College's Office of Institutional Research, Planning, and Information Management, including reporting to the Integrated Postsecondary Education Data System (*a.k.a.* IPEDS), and for students' official academic records, including the production of transcripts and diplomas, as well as the verification of student status via the National Student Clearinghouse.

Legal name will be solicited from the prospective student by the Office of Admissions at the time of application with the uses clearly articulated to the applicant at that time. For matriculated students who are U.S. citizens or permanent residents, this legal name is validated by the Office of Financial Assistance and Veterans' Affairs if the student is seeking federal financial aid or veteran's benefits. Additionally, for students who are eligible for tuition tax credits, in order to meet Internal Revenue Service requirements, the Office of the Treasurer needs a legal name that matches the student's social security number. For matriculated international students, the legal name is validated by the Center for International Education and used by the Office of the Treasurer to meet Internal Revenue Service requirements.

Once the legal name has been determined, it is considered the official name of record for the student and will remain unchanged unless legal documentation is provided to justify altering the original name on the student's official academic record. Students requesting a change in their legal name must submit one of the following legal documents:

- A Social Security Card with the new name. Students may present an original (if presenting in person) or a photocopy notarized by a commissioned notary using the attached [affidavit](#).
- A Valid Passport with the new name. Students may present an original (if presenting in person) or a photocopy notarized by a commissioned notary using the attached [affidavit](#).
- A Certified true copy of a name change Court Order with raised or inked seal.

Requests made by students to change their legal name of record must be submitted on the College's *Student Legal Name Change/Correction Request* form and may be received by the Registrar's Office or by any of the following offices who, for the given student, were responsible for the original validation of their legal name: the Office of Financial Assistance and Veterans' Affairs or the Center for International Education. Students who are employees as well must also submit name change requests to the Office of Career Services, accompanied by documentation consistent with that required upon submission of an I-9 form. Recorded student legal names may also be revised for corrective (data integrity) purposes by the Office of the Registrar, Office of Financial Assistance and Veterans' Affairs, or Center for International Education to match records from SEVIS, the Social Security Administration, Internal Revenue Service, Department of Education, Selective Service System, or Department of Homeland Security.

On a regular basis, an automated report will be produced containing a list of changes to student legal name data in Banner Student. This list will be available for review by each office that requires clean student legal name data and will include the user name of the employee who changed the student record. Copies of processed paper and electronic *Student Legal Name Change/Correction Request* forms will continue to be housed in the Office of the Registrar instance of Banner Document Management (BDM) and will be made available for review by authorized users in the offices that require clean student legal name data.

## Preferred First Name for Students and Employees

A preferred first name is the name a person wishes to be called in day to day life. For example, perhaps you have always gone by your middle name, a nickname, a name that is easier to pronounce, or for transgender individuals, you may self-identify by a name without having legally changed to that name. The College of Charleston intends to provide for the use of a preferred first name for students and employees as follows:

- in our learning management system, currently branded as OAKS, for both students and faculty;
- on Self-Service Banner class rosters and advisee lists provided to instructional faculty;
- in our degree audit system (currently Degree Works), for both students and employees who appear in Degree Works;
- on course schedules (as faculty assignments);
- as a display name in our portal and in employee and student email;
- in all online College of Charleston directories; and
- on campus identification cards (currently Cougar Cards) for both students and employees.

The preferred first name may be up to 25 characters and is limited to alpha characters (A-Z and a-z) and a space or hyphen (-). Individuals should refrain from any of the following in their preferred name:

- Symbols, numbers, unusual capitalization, repeating characters or punctuation;
- Characters from multiple languages;
- Titles of any kind, ex. professional, religious;
- Offensive or suggestive words of any kind; and
- Pretending to be anything or anyone else.

Via these name usage guidelines and subsequent policy and technical work, the College of Charleston intends to provide for the use of preferred first names by students and employees. However, such use will not be a guaranteed right. Inappropriate use of the preferred first name (including but not limited to misrepresentation or avoiding legal obligation) may be cause for denying use of preferred names. The College of Charleston reserves the right to deny or remove the record and use of any preferred first name that is deemed inappropriate.

Preferred first names will be solicited from prospective undergraduate students by the Office of Admissions and from prospective graduate students by the Graduate School, in both cases at the time of application with the uses clearly articulated to the applicant at that time. For matriculated students, the provided preferred first name submitted on the application will be stored in the College's enterprise system on or prior to matriculation and will be available to integrated campus systems. Subsequent student requests by any students (undergraduate or graduate) to record or change a recorded preferred first name must be made on the College's *Student Preferred First Name Change/Correction Request* form and submitted to the Registrar's Office. This form will not solicit a reason for the request.

Preferred first names will be solicited from new regular (non-student) employees by the Office of Human Resources on the *Personal Data Sheet* at the point of initial hire and will be stored in the

College's enterprise system. Subsequent requests to record or change a recorded preferred first name must be on the College's *Name/Address Change Form* and submitted to the Office of Human Resources. This form will not solicit a reason for the request.

In cases where the student has not provided a preferred first name, the first name from the Student Legal Name will serve for the preferred first name uses outlined here. Similarly, in cases where a regular employee has not provided a preferred first name, the first name from the Employment Eligibility Name will serve for the preferred first name uses outlined here.

**Professional Last Name for Employees Who Are Not Also Students**

Regular employees who are not also students are provided the option of a Professional Last Name. The Professional Last Name must be a prior legal last name or a combination of a prior legal last name and the current legal last name, hyphenated or not.